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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 LEON WATSON,
15 Defendant.

No. CR 15-0483 JSW

**STIPULATION AND ~~Proposed~~ ORDER
MODIFYING CONDITIONS OF PRETRIAL
RELEASE**

16 Defendant Leon Watson is released pretrial to the supervision of Pretrial Services. One of the
17 conditions of his pretrial release is that he is subject to home detention with electronic monitoring via a
18 G.P.S. device attached to his ankle, with the conditions currently allowing him to leave home for the
19 only for the limited purposes of medical, legal, religious, employment, and education as approved by
20 Pretrial Services. *See Order Setting Conditions of Release* (Dkt. No. 7).

21 Mr. Watson anticipates entering a guilty plea in the near future pursuant to a plea agreement.
22 The terms of the plea agreement contemplate a sentence that includes a term of imprisonment. Prior to
23 his sentencing, he will need to attend to certain matters to put his and his family's affairs in order, which
24 will necessitate his being able to leave his home for purposes other than those currently set forth in the
25 *Order Setting Conditions of Release*. Defense counsel has communicated with the Pretrial Services
26 Officers handling this matter (one in Oakland, and one in Sacramento providing courtesy supervision, as
27 Mr. Watson and his family reside in Stockton) regarding this proposed modification of the pretrial
28

1 release conditions, and Pretrial Services has reviewed this stipulation and proposed order. They have
2 indicated that they are willing to comply with this order, if approved by the Court, to permit Mr. Watson
3 to attend to matters prior to his sentencing.

4 Therefore, IT IS HEREBY STIPULATED that Mr. Watson's conditions of release may be
5 modified to permit Pretrial Services, at their discretion, to grant permission to Mr. Watson to attend to
6 necessary matters prior to his sentencing upon reasonable advance notice and request by Mr. Watson. If
7 there is disagreement regarding approval of a request from Mr. Watson for a specific purpose, counsel
8 for Mr. Watson will undertake his best efforts to resolve the matter informally with Pretrial Services,
9 and if a resolution cannot be reached, the matter may be brought to the attention of the Court.

10 IT IS SO STIPULATED.

11 Dated: March 21, 2016

/S/

Jonas Lerman

Assistant United States Attorney

[Signed by counsel Vermeulen with approval from
counsel Lerman.]

15 Dated: March 21, 2016

/S/

Mark R. Vermeulen

Attorney for Defendant

LEON WATSON

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ORDER

Based on the foregoing stipulation, and good cause appearing,

IT IS HEREBY ORDERED that Defendant Leon Watson's conditions of release are modified to permit Pretrial Services, at their discretion, to grant permission to Mr. Watson to attend to necessary matters prior to his sentencing upon reasonable advance notice and request by Mr. Watson. If there is disagreement regarding approval of a request from Mr. Watson for a specific purpose, counsel for Mr. Watson will undertake his best efforts to resolve the matter informally with Pretrial Services, and if a resolution cannot be reached, the matter may be brought to the attention of the Court.

IT IS SO ORDERED.

Dated: March 25, 2016


Kandis A. Westmore
United States Magistrate Judge